



December 13, 1999

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Mr. Neil A. Evans
Reports Analyst
Reports Analyst Division
Federal Election Commission
Washington, D.C. 20463

Re: Identification Number: C00004036
SEIU Committee on Political Education
August Monthly Report (7/1/99 - 7/31/99)

Dear Mr. Evans:

This is in response to your letter of September 9, 1998, regarding the Service Employees International Union's Committee on Political Education ("COPE") August 1999 monthly report. The entry on Line 29 in Schedule B reported as "refund to SEIU PEA Fund International" refers to a transfer out of soft money that was improperly deposited into the Committee's hard money fund. The soft money contributions were received in June 1999 and improperly designed for the hard money account.

The amount involved constituted small individual contributions which did not qualify as hard money contributions. Accordingly, we reported the contributions in the July 1999 monthly report as un-itemized contributions because none of the contributions exceeded the reporting thresholds for itemization. When the error was discovered, we immediately transferred the money to the soft money account.

If you have any further questions regarding these matters, please feel free to contact me.

Sincerely,

Orrin Baird

Associate General Counsel

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